

KING & SPALDING LLP  
1185 Avenue of the Americas  
New York, New York 10036  
Telephone: (212) 556-2100  
Facsimile: (212) 556-2222  
Arthur Steinberg  
Scott Davidson

KIRKLAND & ELLIS LLP  
300 North LaSalle  
Chicago, IL 60654  
Telephone: (312) 862-2000  
Facsimile: (312) 862-2200  
Richard C. Godfrey, P.C. (admitted *pro hac vice*)  
Andrew B. Bloomer, P.C. (admitted *pro hac vice*)

*Attorneys for General Motors LLC*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X		
In re	:	Chapter 11
	:	
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:	Case No.: 09-50026 (REG)
f/k/a General Motors Corp., <i>et al.</i>	:	
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X		

**NOTICE OF MATTERS SCHEDULED FOR  
HEARING ON OCTOBER 14, 2015 AT 9:45 A.M. (EASTERN TIME)**

Location of Hearing: United States Bankruptcy Court for the Southern District of New York,  
Alexander Hamilton U.S. Custom House, before the Honorable Robert E.  
Gerber, United States Bankruptcy Judge, Courtroom 523, One Bowling  
Green, New York, NY 10004-1408.

**I. MATTERS FOR ORAL ARGUMENT**

1. *Scheduling Order Signed on 9/3/2015 Regarding Case Management Order re: No-Strike, No Stay, Objection, and GUC Trust Asset Pleading [Docket No. 13416]*

2. *Memorandum Endorsed Order Signed on 9/3/2015 Regarding Scheduling Order* [Docket No. 13417]

**A. PUNITIVE DAMAGES ISSUE**

3. *Letter Regarding Punitive Damages Issue*, dated September 13, 2015, filed by Gary Peller on behalf of Sharon Bledsoe. [Docket No. 13432]
4. *Post-Closing Ignition Switch Accident Plaintiffs' Memorandum Of Law With Respect To Punitive Damages Issue*, dated September 13, 2015, filed by William P. Weintraub on behalf of Hilliard Munoz Gonzales LLP and Thomas J. Henry Injury Attorney. [Docket No. 13434]
5. *Joinder of the Ignition Switch Plaintiffs and Non-Ignition Switch Plaintiffs to the Post-Closing Ignition Switch Accident Plaintiffs' Memorandum of Law With Respect to Punitive Damages*, dated September 13, 2015, filed by Steve Berman on behalf of Ignition Switch Plaintiffs, Non-Ignition Switch Plaintiffs. [Docket No. 13436]
6. *Opening Brief by General Motors LLC with Respect to Whether Plaintiffs May Seek Punitive Damages From General Motors LLC Based on the Conduct of General Motors Corporation*, dated September 13, 2015, filed by Arthur Jay Steinberg on behalf of General Motors LLC. [Docket No. 13437]
7. *Post-Closing Ignition Switch Accident Plaintiffs' Reply with Respect to Punitive Damages Issue*, dated September 22, 2015, filed by William P. Weintraub on behalf of Post-Closing Ignition Switch Accident Plaintiffs. [Docket No. 13459]
8. *Reply Brief by General Motors LLC with Respect to Whether Plaintiffs May Seek Punitive Damages from General Motors LLC Based on the Conduct of General Motors Corporation*, dated September 22, 2015, filed by Arthur Jay Steinberg on behalf of General Motors LLC. [Docket No. 13460]
9. *Joinder of the Ignition Switch Plaintiffs and Non-Ignition Switch Plaintiffs to the Post-Closing Ignition Switch Accident Plaintiffs' Reply With Respect to Punitive Damages Issue*, dated September 22, 2015, filed by Steve Berman on behalf of Ignition Switch Plaintiffs, Non-Ignition Switch Plaintiffs. [Docket No. 13461]
10. *Brief of Moore Plaintiffs Regarding Punitive Damages Issue*, dated September 13, 2015

## B. IMPUTATION ISSUE

11. *Letter Elliott, Sesay, and Bledsoe Plaintiffs Joining the Brief of Other Parties on Imputation Issue*, dated September 18, 2015, filed by Gary Peller on behalf of Sharon Bledsoe. [**Docket No. 13448**]
12. *Opening Brief By General Motors LLC With Respect To Whether Plaintiffs Can Automatically Impute To New GM Knowledge Of The Events That Took Place At Old GM and/or As Reflected In Old GMs Books And Records*, dated September 18, 2015, filed by Arthur Jay Steinberg on behalf of General Motors LLC. [**Docket No. 13451**]
13. *Opening Brief on Imputation Issue*, September 18, 2015, filed by Steve Berman on behalf of Ignition Switch Plaintiffs, Non-Ignition Switch Plaintiffs, State of Arizona ex rel. Mark Brnovich, the Attorney General, The Adams Plaintiffs, The People of the State of California, acting by and through Orange County District Attorney Tony Rackauckas, The Post-Closing Ignition Switch Accident Plaintiffs. [**Docket No. 13452**]
14. DOCUMENT FILED UNDER SEAL *Opening Brief on Imputation Issue on Behalf of the Ignition Switch Plaintiffs, the Non-Ignition Switch Plaintiffs, the State of Arizona, the People of the State of California, the Post-Closing Ignition Switch Accident Plaintiffs and the Adams Plaintiffs*, dated September 21, 2015, filed by Steve Berman on behalf of The Adams Plaintiffs, The Post-Closing Ignition Switch Accident Plaintiffs, Ignition Switch Plaintiffs, Non-Ignition Switch Plaintiffs, State of Arizona ex rel. Mark Brnovich, the Attorney General, The People of the State of California, acting by and through Orange County District Attorney Tony Rackauckas. [**Docket No. 13454**]
15. *Reply Brief by General Motors LLC with Respect to Whether Plaintiffs Can Automatically Impute to New GM Knowledge of the Events that Took Place at Old GM and/or as Reflected in Old GMS Books and Records*, dated September 30, 2015, filed by Arthur Jay Steinberg on behalf of General Motors LLC. [**Docket No. 13482**]
16. *Reply Brief on Imputation Issue on Behalf of the Ignition Switch Plaintiffs, the Non-Ignition Switch Plaintiffs, the State of Arizona, The People of the State of California, the Post-Closing Ignition Switch Accident Plaintiffs and the Adams Plaintiffs*, dated September 30, 2015, filed by Steve Berman on behalf of Ignition Switch Plaintiffs, Non-Ignition Switch Plaintiffs, State of Arizona ex rel. Mark Brnovich, the Attorney General, The People of the State of California, acting by and through Orange County District Attorney Tony Rackauckas. [**Docket No. 13483**]

### C. MARKED COMPLAINTS

17. *New GM Bellwether Letter, with Marked Bellwether Complaints, Pursuant to Scheduling Order dated September 3, 2015*, dated September, 21, 2015, filed by Arthur Jay Steinberg on behalf of General Motors LLC. [**Docket No. 13456**]
18. *Letter Filed on Behalf of General Motors LLC Regarding Other Plaintiffs' Complaints*, dated September 23, 2015, filed by Arthur Jay Steinberg on behalf of General Motors LLC. [**Docket No. 13466**]
19. *New GM MDL Complaint Letter, with Marked MDL Complaint, Pursuant to Scheduling Order dated September 3, 2015*, dated September 25, 2015, filed by Arthur Jay Steinberg on behalf of General Motors LLC. [**Docket No. 13469**]
20. *New GM States Complaints Letter, with Marked States Complaints, Pursuant to Scheduling Order dated September 3, 2015*, dated September 25, 2015, filed by Arthur Jay Steinberg on behalf of General Motors LLC. [**Docket No. 13470**]
21. *Letter dated September 28, 2015 to Judge Gerber from William P. Weintraub re: Response to New GM Bellwether Letter and Marked Bellwether Complaints*, dated September 28, 2015, filed by William P. Weintraub on behalf of Hilliard Munoz Gonzales LLP and Thomas J. Henry Injury Attorney. [**Docket No. 13475**]
22. *Letter on Behalf of Carolyn Rickard, Adm'x. of the Estate of William Rickard, Deceased, in Response to General Motors, LLC's Letter Regarding Other Plaintiffs' Complaints*, dated September 29, 2015, filed by Julianne Cutruzzula Beil on behalf of Carolyn Rickard. [**Docket No. 13478**]
23. *Letter on behalf of the Elliott, Sesay and Bledsoe Plaintiffs Regarding New GM's Marked Pleadings Letter*, dated September 29, 2015, filed by Gary Peller on behalf of Sharon Bledsoe. [**Docket No. 13479**]
24. *Responsive Letter from Moore Plaintiffs Regarding Other Plaintiffs' Complaint*, dated September 30, 2015.
25. *Letter Response to New GM Marked State Complaints [ECF No. 13470] & Explanatory Letter*, dated October 9, 2015, filed by Steve Berman on behalf of State of Arizona ex rel. Mark Brnovich, the Attorney General, The People of the State of California, acting by and through Orange County District Attorney Tony Rackauckas. [**Docket No. 13494**]
26. *Letter Response to New GM's Marked MDL Complaint [Dkt. No. 13469] & Explanatory Letter*, dated October 9, 2015, filed by Steve Berman on behalf of Ignition Switch Plaintiffs, Non-Ignition Switch Plaintiffs. [**Docket No. 13495**]

#### **D. OTHER PLEADINGS**

27. *People of the State of California's "No Strike" Pleading*, dated June 16, 2015, filed by Steve Berman on behalf of The People of the State of California, acting by and through Orange County District Attorney Tony Rackauckas. [**Docket No. 13210**]
28. *State of Arizona's "No Strike" Pleading*, dated June 16, 2015, filed by Steve Berman on behalf of State of Arizona ex rel. Mark Brnovich, the Attorney General. [**Docket No. 13211**]
29. *The Ignition Switch Plaintiffs' No Strike Pleading with Regard to the Second Amended Consolidated Complaint; and the Non-Ignition Switch Plaintiffs' (I) Objection Pleading with Regard to the Second Amended Consolidated Complaint and (II) GUC Trust Asset Pleading*, dated June 24, 2015, filed by Edward S. Weisfelner on behalf of Designated Counsel for the Ignition Switch Plaintiffs & Certain Non-Ignition Switch Plaintiffs. [**Docket No. 13247**]
30. *Omnibus Response By General Motors LLC To The No Strike Pleadings Filed By The States Of Arizona And California*, dated July 10, 2015, filed by Arthur Jay Steinberg on behalf of General Motors LLC. [**Docket No. 13286**]
31. *Response By General Motors LLC To The Ignition Switch Plaintiffs' No Strike Pleading With Regard To The Second Amended Consolidated Complaint; And The Non-Ignition Switch Plaintiffs' Objection Pleading With Regard To The Second Amended Consolidated Complaint*, dated July 23, 2015, filed by Arthur Jay Steinberg on behalf of General Motors LLC. [**Docket No. 13316**]
32. *Adams Plaintiffs' No Dismissal Pleading*, dated August 11, 2015, filed by Gregory W. Fox on behalf of Hilliard Munoz Gonzales LLP and Thomas J. Henry Injury Attorney. [**Docket No. 13359**]
33. *Response By General Motors LLC To Adams Plaintiffs No Dismissal Pleading*, dated September 3, 2015, filed by Arthur Jay Steinberg on behalf of General Motors LLC. [**Docket No. 13422**]
34. *Statement of Good Faith Filing*, dated September 4, 2015, filed by Julianne Cutruzzula Beil on behalf of Carolyn Rickard. [**Docket No. 13423**]

Dated: October 13, 2015  
New York, New York

KING & SPALDING LLP

By: /s/ Scott Davidson  
Arthur J. Steinberg  
Scott Davidson  
King & Spalding LLP  
1185 Avenue of the Americas  
New York, NY 10036  
Telephone: (212) 556-2100  
Facsimile: (212) 556-2222

Richard C. Godfrey, P.C. (admitted *pro hac vice*)  
Andrew B. Bloomer, P.C. (admitted *pro hac vice*)  
KIRKLAND & ELLIS LLP  
300 North LaSalle  
Chicago, IL 60654  
Telephone: (312) 862-2000  
Facsimile: (312) 862-2200

*Attorneys for General Motors LLC*